

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case Number: 1:23-CV-60966-KMW

JANE DOE,

Plaintiff,

vs.

JAZWARES, LLC,

Defendant

Plaintiff's Second Unopposed Motion for Leave to File Under Seal

Pursuant to Local Rule 5.4 and the parties Confidentiality Agreement and Stipulation, plaintiff, Jane Doe, moves for leave to file under seal Exhibit A to Plaintiff's Reply to Defendant's Response to Plaintiff's Motion to Compel re: After-Acquired Discovery [DE 44-1] that contains a document defendant, Jazwares, LLC, has labeled "confidential".

Pursuant to the parties confidentiality agreement and stipulation, a party may not publicly file documents another party labeled "confidential". Accordingly, plaintiff moves for leave to file under seal a one page document regarding signatory approvals labeled by defendant, Jazwares, LLC. as "confidential".

Local Rule 7.1 Conferral. Plaintiff has conferred with defendant in a good faith effort to resolve the issues raised in the motion and defendant does not object to the requested relief.



Respectfully submitted,

THE AMLONG FIRM
Attorney for Plaintiff
500 Northeast Fourth Street
Suite 101
Fort Lauderdale, Florida 33301-1154
(954) 462-1983

/s/Rani Nair Bolen
KAREN COOLMAN AMLONG
Florida Bar No: 275565
kamlong@theamlongfirm.com
WILLIAM R. AMLONG
Florida Bar No: 470228
wramlong@theamlongfirm.com
RANI NAIR BOLEN
Florida Bar No: 29293
rbolen@theamlongfirm.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
CM/ECF this 8th day of January, 2024 on all counsel or parties of record on the Service List
below.

/s/Rani Nair Bolen
RANI NAIR BOLEN

Service List

KAREN COOLMAN AMLONG

Florida Bar No. 275565

Kamlong@TheAmlongFirm.com

WILLIAM R. AMLONG

Florida Bar No. 470228

WRamlong@TheAmlongFirm.com

RANI NAIR BOLEN

Florida Bar No. 29293

Rbolen@TheAmlongFirm.com

THE AMLONG FIRM

500 Northeast Fourth Street

Suite 101

Fort Lauderdale, Florida 33301-1154

(954) 462-1983

Attorneys for Plaintiff

JONATHAN A. BECKERMAN

Florida Bar No. 568252

Jonathan.Beckerman@lewisbrisbois.com

NICOLE VESCOVA

Florida Bar No. 1041288

nicole.vescova@lewisbrisbois.com

LEWIS BRISBOIS BISGAARD& SMITH, LLP

110 SE 6th Street, Suite 2600

Fort Lauderdale, FL 33134

(954) 728-1280

Attorneys for Defendant